

Jessica A. Skelton, OSB #102714  
jessica.skelton@pacificallawgroup.com  
PACIFICA LAW GROUP LLP  
1191 2<sup>nd</sup> Avenue, Suite 2000  
Seattle, WA 98101-3404  
206-245-1700

*Attorney for Intervenor-Defendant  
Oregon Alliance for Gun Safety*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

KATERINA B. EYRE, TIM FREEMAN,  
MAZAMA SPORTING GOODS,  
NATIONAL SHOOTING SPORTS  
FOUNDATION, and OREGON STATE  
SHOOTING ASSOCIATION,

Plaintiffs,

v.

ELLEN ROSENBLUM, Attorney General  
of the State of Oregon, in her official  
capacity, and TERRI DAVIE,  
Superintendent of the Oregon State Police,

Defendants.

No. 3:22-cv-01862-IM

DECLARATION OF  
THOMAS WHEATLEY IN  
SUPPORT OF OREGON ALLIANCE  
FOR GUN SAFETY'S MOTION TO  
INTERVENE AS A DEFENDANT

I, Thomas Wheatley, declare as follows:

1. I am the senior advisor of Proposed Intervenor-Defendant Oregon Alliance for Gun Safety. I am over the age of eighteen, competent to testify, and make this declaration based on my personal knowledge.

2. I am a senior advisor for the Oregon Alliance for Gun Safety (the "Alliance"). The Alliance is a nonprofit, 501(c)(4) corporation based in Portland, Oregon, that is dedicated to ending gun violence and promoting a culture of gun ownership that balances rights with responsibilities. It

was formed in 2013 in the wake of the Sandy Hook Elementary School gun massacre, which left 20 children and six adults dead. The Alliance collaborates with experts, civic leaders, and citizens at the local and national level to identify and develop innovative, evidence-based solutions to the crisis of gun violence. The Alliance also promotes these solutions in Oregon through political organizing, advocacy, and community education.

3. The Alliance has successfully supported several gun safety measures in Oregon through political research, organizing, lobbying, and campaigning. These include efforts that contributed to the Oregon Legislature's 2015 passage of the Oregon Firearms Safety Act, SB 941, which significantly expanded background checks for firearm transfers in our state. We also lobbied for and supported the passage of Oregon's Red Flag Law, SB 719, in 2017. This law allows individuals to request Extreme Risk Protection Orders so that a court can order the removal of firearms from gun owners that are at serious risk of harming themselves or others.

4. From the Alliance's early days, we have worked closely with our partner organization in Washington State, the Alliance for Gun Responsibility (the "Washington Alliance"). This has included extensive work analyzing and promoting ballot initiatives aimed at enacting common sense gun safety measures. The Alliance has also worked with the Washington Alliance to raise significant funds to support gun safety efforts in Oregon, including Ballot Measure 114, Changes to Firearm Ownership and Purchase Requirements Initiative ("Measure 114").

5. The Alliance also works with several partner organizations in Oregon that share similar goals. This work included preliminary polling that we shared with partner organizations to inform the drafting of various gun safety proposals, including Measure 114. Our partner organization, Lift Every Voice Oregon ("LEVO") led the drafting and signature gathering for Measure 114. Once the measure was on the ballot, the Alliance took a leading role in coordinating support for Measure 114

and promoting it to voters.

6. In August of 2022, the Alliance formed Safe Schools, Safe Communities Oregon, a political action committee (“PAC”) with the purpose of ensuring that Measure 114 was approved by the voters of Oregon. The Alliance then brought together members of its partner organizations to form a steering committee for the PAC.

7. In my role as senior advisor to the Alliance, I played an active leadership role of the steering committee. This entailed overseeing much of the campaign in support of Measure 114. For example, I recruited the campaign manager for the campaign and developed the bulk of the campaign strategy that was approved by the steering committee.

8. I also coordinated the efforts of many of the campaign’s allies. This involved reaching out to law enforcement leaders, healthcare workers, national partners and survivors of gun violence to assemble a diverse coalition of supporters; organizing press conferences to promote Measure 114, including a campaign press conference with an expert from Johns Hopkins University; overseeing the extensive drafting process for 30 different voter pamphlet statements signed by over 150 community leaders and organizations in support of Measure 114; preparing campaign allies to meet with newspaper editorial boards to gain endorsements; and tapping the Alliance’s extensive list of supporters’ emails to educate Oregonians on Measure 114 and how they could help the campaign effort.

9. Additionally, I managed the paid advertising efforts for the campaign. These advertisements included direct mailers which were sent to over 300,000 households. Attached as **Exhibit A** are true and correct copies of two direct mailers we sent in support of Measure 114. We also did extensive advertising through social media like Facebook and Instagram, and streaming services like YouTube, Disney+ and Hulu. In total, the independent expenditures that I oversaw for

the PAC totaled approximately \$2.1 million, including \$1.8 Million in paid advertising, all with the goal of passing Measure 114.

10. The Alliance views the passage of Measure 114 as its most significant accomplishment in recent years and is proud to have played a leading role in the campaign to pass the measure. As the recent tragedies in Buffalo, New York; Uvalde, Texas; Colorado Springs, Colorado; and a seemingly ever-growing list of other mass shootings show, we need common sense gun reform now more than ever. The Alliance is committed to ensuring that Measure 114 is implemented.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 13th day of December, 2022 at Portland, Oregon.



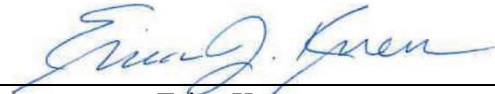
---

Thomas Wheatley

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of December, 2022, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

DATED this 14th day of December, 2022.



---

Erica Knerr